

DeCOTIIS, FITZPATRICK, COLE & GIBLIN, LLP

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**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

MEGAN SCHAFFER,

Plaintiff,

v.

BOROUGH OF PARAMUS; KEN RASCHEN in his individual and official capacity; JOSEPH “JAY” SEXTON in his individual and official capacity; ROBERT KAISER, in his individual and official capacity; ACE ANTONIO, in his individual and official capacity; JEANNE WEBER, in her individual and official capacity; WILLIAM R. COMERY, in his individual and official capacity; HECTOR OLMO, in his individual and official capacity,

Defendants.

Civil Action No. 2:23-cv-00530-BRM-MAH

Civil Action

**CERTIFICATION OF
GREGORY J. HAZLEY
IN SUPPORT OF
MOTION TO AMEND
AND REMAND**

I, **GREGORY J. HAZLEY**, being of full age and duly sworn upon my oath, deposes and says:

1. I am an attorney-at-law in the State of New Jersey and a partner with the law firm of DeCotis, FitzPatrick, Cole & Giblin, LLP, which represents Plaintiff Meghan Schaffer in the above-captioned matter.
2. I am personally familiar with the facts in this matter and I make this certification in support of Plaintiff's motion to amend and remand.
3. Plaintiff filed a complaint on December 27, 2022 in the Superior Court of New Jersey, which was subsequently (twice) removed to this Court pursuant to original jurisdiction pursuant to 28 U.S.C. § 1441 (ECF #1, 4, 8). The basis of removal was two claims against defendants under Title VII of the Civil Rights Act of 1964.
4. On February 1, 2023, plaintiff moved to remand the case based on procedural deficiencies in the removal process (ECF #4). On, July 10, 2023, this Court denied Plaintiff's motion to remand, finding defendants' initial removal defective but also finding a second removal petition filed after the filing of plaintiff's motion to be valid (ECF #16).
5. Attached hereto as **Exhibit A** is a copy of the proposed First Amended Complaint in this matter.
6. Attached hereto as **Exhibit B**, pursuant to L. Cv. R. 15.1(a)(2), is a form of the amended pleading that indicates in what respects it differs from the initial complaint.

7. The First Amended Complaint does not contain any federal claims invoking this Court's original jurisdiction.
8. On July 13, 2023, counsel for Plaintiff emailed counsel for all defendants seeking consent for the filing of the proposed First Amended Complaint. Counsel of record for the Borough and defendants Raschen, Sexton, Comery, Weber and Olmo consented to the filing. Counsel for defendant Kaiser advised that he would review the proposed pleading and advise as to whether he consented, while co-counsel for defendant Antonio has not yet responded to the request.

I hereby certify that the foregoing statements are true and that all documents annexed hereto are exact copies of the entire original document. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

Dated: July 14, 2023 By: /s/ Gregory J. Hazley